

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION**

MISSOURI PRIMATE FOUNDATION,)
CONNIE BRAUN CASEY, individually,)
ANDREW SAWYER, individually, and)
JANE DOES 1 and 2,)

Plaintiffs and Counterclaim)
Defendants,)

Case No. 4:16-cv-02163

v.)

PEOPLE FOR THE ETHICAL)
TREATMENT OF ANIMALS, INC. and)
ANGELA SCOTT a/k/a ANGELA G.)
CAGNASSO, individually,)

Defendants and)
Counterclaim Plaintiffs.)

)

CONSENTED MOTION FOR EXTENSION OF TIME TO RESPOND TO MOTION
FOR SANCTIONS FOR SPOILIATION OF EVIDENCE

COMES NOW Plaintiff/Counterclaim Defendant Connie Braun Casey (“Ms. Casey”), by and through the undersigned counsel, and with the consent of Counterclaim Plaintiffs People for the Ethical Treatment of Animals, Inc. and Angela Scott, respectfully move this Court for its Order extending the period of time for which Ms. Casey may respond to Counterclaim Plaintiffs’ Motion for Sanctions for Spoliation of Evidence, up to and including June 18, 2018.

Dated this 18th day of June, 2018.

Respectfully Submitted,

KLAR, IZSAK & STENGER, L.L.C.

By: /s/ Daniel T. Batten
BRIAN D. KLAR, #36430
DANIEL T. BATTEN, #58810
Attorneys for Co-Defendant
1505 S. Big Bend Blvd.
St. Louis, Missouri 63117
Phone: 314-863-1117
Fax: 314-863-1118
Email: bklar@lawsaintlouis.com
dbatten@lawsaintlouis.com

CERTIFICATE OF SERVICE

I hereby certify that on **June 18, 2018**, the foregoing was electronically filed with the Clerk of the Court using the CM/ECF system, by which notification of such filing was electronically sent and served via first class mail, postage prepaid, to the following:

POLSINELLI PC
KELLY J. MUENSTERMAN (#66968)
JAMES P. MARTIN (#50170)
100 S. Fourth Street, Suite 1000
St. Louis, MO 63102
314.889.8000
Fax No: 314.231.1776
kmuensterman@polsinelli.com
jmartin@polsinelli.com

PETA FOUNDATION
JARED S. GOODMAN
(Admitted *Pro Hac Vice*)
2154 W. Sunset Blvd.
Los Angeles, CA 90032
323.210.2266
Fax No: 213.484.1648
*Attorneys for Defendant/Counterclaim
Plaintiff*

Patrick J. Hanley, Esq.
214 E. Fourth Street
Covington, KY 41011
*Attorney for Plaintiff/Counterclaim
Defendant Vito Stramaglia*

Missouri Primate Foundation
12338 State Road CC
Festus, MO 63028

Geordie Duckler
9397 SW Locust Street
Tigard, OR 97223
geordied@animallawpractice.com
*Attorneys for Plaintiff/Counterclaim
Defendant Andrew Sawyer*

/s/ Daniel T. Batten